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**VIA ECF**

Honorable Vernon S. Broderick  
United States District Judge  
Southern District of New York

Re: Colon v. N.Y.C. Hous. Auth. et al.,  
16 Civ. 4540 (VSB) (OTW)

Williams v. N.Y.C. Hous. Auth. et al.,  
16 Civ. 8193 (VSB) (OTW)

Dear Judge Broderick:

I am an Assistant Corporation Counsel in the office of Zachary W. Carter, Corporation Counsel of the City of New York, counsel for Defendant Melissa Mark-Viverito in the above-referenced actions, which were consolidated for pre-trial purposes. I write on behalf of all Defendants to propose a briefing schedule for all Defendants' anticipated motions for summary judgment in both the *Colon* and *Williams* matters.

Discovery closed in both actions on July 15, 2019. Defendants submit that summary judgment is warranted in both actions and do not wish to engage in settlement discussions. The parties are in the process of reviewing and notarizing transcripts for depositions that occurred in June and July. The parties are also awaiting decisions from Magistrate Judge Wang regarding a motion to compel brought by Defendants on May 28, 2019 and an untimely motion to compel brought by Plaintiffs on July 23, 2019. However, there has been no request for an adjournment of the discovery deadline pursuant to Magistrate Judge Wang's rules from any party, and Magistrate Judge Wang's May 7, 2019 Order states there will be no further adjournments of the discovery deadline.

For the Court's convenience, and to avoid unnecessary duplication, Defendants propose briefing summary judgment in the *Colon* and *Williams* actions contemporaneously. Defendants have requested Plaintiffs' input and consent for a summary judgment briefing schedule, but Plaintiffs refuse to engage in a discussion of a schedule. Accordingly, Defendants respectfully request that the Court so-order the following briefing schedule:

- Defendants to file summary judgment motions by October 18, 2019;
- Plaintiffs to file opposition by December 6, 2019;
- Defendants to file reply papers by December 27, 2019.

I thank the Court for its attention to this matter.

Respectfully,

/s/

John Corbin Carter

Assistant Corporation Counsel

cc: All Counsel of Record  
(via ECF)